

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN SECTION

JANE DOE, JANE DOE NO. 2 AND JANE DOE NO. 3
INDIVIDUALLY AND AS CLASS REPRESENTATIVES
OF ALL OTHERS SIMILARLY SITUATED,

Plaintiffs,

vs.

Docket No.: 2:13-cv-03002

CITY OF MEMPHIS,

Defendant.

PLAINTIFFS' MOTION FOR PROTECTIVE ORDER

COME NOW, Plaintiffs Jane Doe, Jane Doe No. 2, and Jane Doe No. 3, by and through undersigned counsel of record and on behalf of themselves individually and others similarly situated, and move this Court for a Protective Order from Defendant City of Memphis' discovery requests until such time that the City complies with Plaintiffs' previously propounded discovery requests.

CERTIFICATE OF CONSULTATION

On October 29, 2014, Plaintiffs' counsel contacted counsel for the City of Memphis via phone and email to consult regarding the relief sought in this Motion. As of this filing, Plaintiffs' counsel has not received a response.

s/ Robert L. J. Spence, Jr.

Respectfully submitted,

THE SPENCE LAW FIRM, PLLC

By: /s/ Robert L. J. Spence, Jr.
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing has been served through the Court's ECF filing system to Defendant and all other parties who receive notices through the Court's ECF filing system on this 29th day of October, 2014.

/s/ Robert L. J. Spence, Jr.